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*Attorneys for Defendant*  
*NETFLIX, INC.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

LAURI VALJAKKA,

*Plaintiff,*

v.

NETFLIX, INC.,

*Defendant.*

Case No. 4:22-cv-01490-JST

**DECLARATION OF ELISE EDLIN IN  
SUPPORT OF DEFENDANT NETFLIX,  
INC.'S UNOPPOSED MOTION FOR  
LEAVE TO SUPPLEMENT ITS  
RESPONSIVE DAMAGES  
CONTENTIONS**

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Judge: Hon. Jon S. Tigar  
Hearing Date: 09/07/2023  
Time: 2:00 p.m.

1 I, Elise Edlin, hereby declare:

2 1. I am an attorney with the law firm Perkins Coie LLP, based in San Francisco,  
3 California, and counsel representing Defendant Netflix, Inc. (“Netflix”). I have personal  
4 knowledge of the facts set forth in this declaration and am competent to testify.

5 2. I am submitting this declaration in support of the Defendant Netflix, Inc.’s  
6 Unopposed Motion for Leave to Supplement Its Responsive Damages Contentions.

7 3. Netflix and Plaintiff Mr. Valjakka made additional productions of documents  
8 relevant to damages between October 3, 2022 and the close of fact discovery on June 14, 2023.

9 4. The parties met and conferred on June 14, 2023 regarding the motion, and Plaintiff  
10 confirmed he would not oppose the motion.

11 5. Attached hereto as Exhibit A is a true and correct copy of Defendant Netflix, Inc.’s  
12 Patent L.R. 3-9 Supplemental Responsive Damages Contentions.

13  
14 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true  
15 and correct to the best of my knowledge.

16 Executed on June 20, 2023 in Oakland, California.

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18 /s/ Elise E. Edlin  
19 Elise S. Edlin  
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